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Engineering Circular No.4 of 2013

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Subject: Carriage of oil as cargo in offshore Supply / Support Vessels (OSV) and applicability of the provisions of MARPOL Annex I.

1. Background

1.1 The particular construction and design features of Offshore Supply Vessels (OSVs) do not permit them to carry crude oil or petroleum products having a flashpoint of less than 60°C (closed cup test) or other liquid products having a similar fire hazard. The mud, brine tanks and venting arrangements on OSVs are not designed or classified to carry oil cargoes with a flashpoint of less than 60°C or noxious substances. However, some of the OSVs are fitted with cargo spaces which are constructed and utilized to carry oil in bulk and such ships are categorised as 'ship other than Oil Tanker' and are being issued with Form B supplement as applicable to oil tankers, in accordance with Regulation 2.2 of Annex 1 of the MARPOL Convention.

1.2 Regulation 2.2 of Annex 1 of the MARPOL Convention, further states that in ships carrying oil in bulk of an aggregate capacity of 200 cubic meters or more, the requirements of regulations 16, 26.4, 29, 30, 31, 32, 34 and 36 of this Annex for oil tankers shall also apply to the construction and operation of those spaces, except that where such aggregate capacity is less than 1,000 cubic meters, the requirements of regulation 34.6 (Requirements for oil tankers less than 150GT) of the Annex 1 may apply in lieu of regulations 29, 31 and 32.

2. Purpose

This Directorate has been receiving representations from various ship owners and Recognized Organizations, seeking clarification regarding the applicability of Regulation 2.2 of Annex 1 of the MARPOL Convention to the Offshore Supply Vessels. It is noted further that lack of uniformity prevails as of now in calculating the **aggregate capacity** of the cargo spaces. This circular is being issued to streamline the procedures in such cases and to avoid case to case interpretation by the stake holders.

3. Applicability

3.1 This guideline applies to offshore supply/support vessels (OSVs), regardless of size or voyage, which are engaged in the transport of stores, materials and equipment to and from mobile offshore drilling rigs, fixed and floating platforms, sub-sea installations and other similar offshore installations.

3.2 The SOLAS, MARPOL Conventions and provisions of the IMDG Code in force from time to time shall apply in all such cases, inter-alia, the IMO Resolution A.863 (20) - Code of Practice for the Carriage of Cargoes and Persons by Offshore Supply Vessels amended by Res.MSC.237 (82). The Engineering Circular 3 of 2013 may also be referred as applicable.

4. Procedure to be followed while issuing Form B to the OSVs

4.2 In some of the designs of the OSVs, even the tanks which are meant for domestic fuel consumption are also connected to the cargo system and the loading and discharging lines in such cases are common. There have been varying interpretations on the calculation of aggregate carrying capacity in such cases, with consequential effect on the extent of applicability of para. 1.2.

4.3 The matter was deliberated at the Directorate with various stake holders including the Recognised Organizations and considering that such arrangements in these vessels are in existence for quite some time and complete alteration of the pumping arrangements at this stage may face several technical difficulties, the competent authority hereby issues the following clarification for the uniform application in all such cases:

4.3.1 While calculating the aggregate cargo carrying capacity of any OSV, capacity of all the tanks connected to the pumping, piping and discharge arrangement with the cargo spaces to be considered **excluding** the tanks which are connected to the vessel's Bunker tanks and associated pipe lines and are exclusively used for the domestic bunkering purposes, even when they have interconnections with the cargo pumping systems.

4.3.2 Such tanks designated for the vessel's domestic consumption shall carry only bunker oil for the main propulsion and other onboard auxiliary services and

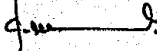
in no case be used for carriage of cargo. The Oil record book (ORB Part I), Bunker Delivery Note (BDN) for the received bunker and other relevant documents / records to establish the above shall be maintained readily available onboard such vessels for verification by competent authorities.

4.3.3 No further relaxation is permitted in such cases, including for the mud or brine tanks and isolation of some oil tanks from cargo system by 'temporary means' for reducing the cargo capacity merely to avoid certain requirements is not permitted.

4.3.4 Further, Regulation 12A of Annex 1 of the MARPOL i.e. Oil Fuel Tank Protection for OSVs with an aggregate oil fuel capacity of 600 cub meter and above and constructed on or after 1-8-2007 or delivered on or after 1-8-2010 shall continue to be applicable in such cases.

4.4. The Recognised Organization undertaking the International Oil Pollution Prevention (IOPP) surveys shall verify the compliance of the above and report to the Administration, if any deviation is noticed.

This is issued with the approval of the competent authority and comes into effect from the date of issue of this circular.


(K.M. Rao)

E & SS cum Dy. DG (Tech)

TO

1. The Principal Officer, Mercantile Marine Department, Mumbai/Kolkata/ Chennai/ Kandla/Cochin.
2. The Surveyor-in-charge, Mercantile Marine Department, Goa/Jamnagar/Port Blair /Visakhapatnam /Tuticorin /Delhi /Haldia/ Paradip /Mangalore.
3. All Classification Societies.
4. Indian National Shippers Association (INSA), Mumbai
5. All Shipping Companies
6. CS/NA/CSS
7. The Engineering Branch
8. The Nautical Branch
9. The Naval Architecture Branch
10. Hindi Cell
11. Guard file.
12. Computer Cell

